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1 2 3 4 5 6 7 8 9	LAUREN GALLO WHITE, State Bar No. 309075 WILSON SONSINI GOODRICH & ROSATI Professional Corporation One Market Plaza Spear Tower, Suite 3300 San Francisco, CA 94105 Telephone: (415) 947-2000 Facsimile: (415) 947-2099 Email: lwhite@wsgr.com MENG JIA YANG, State Bar No. 311859 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: mjyang@wsgr.com	
11	Attorneys for Defendant GOOGLE LLC	
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14	SAN JOSE D	IVISION
15	AMBASSADOR MARC GINSBERG and) CASE NO.: 5:21-CV-00570-BLF
16 17 18 19 20	COALITION FOR A SAFER WEB, Plaintiffs, v. GOOGLE LLC, Defendant.	JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND GOOGLE LLC'S DEADLINE TO FILE REPLY IN SUPPORT OF ITS MOTION TO DISMISS
21) Judge Beth Labson Freeman
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20	JOINT STIPULATION AND [PROPOSED] ORDER	CASE No.: 5:21-CV-00570-BLF

JOINT STIPULATION 1 Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, "Plaintiffs"), and 2 3 Defendant Google LLC, erroneously sued as Google Inc. ("Google"), jointly submit this 4 stipulation to extend Google's deadline to file a reply in support of its motion to dismiss. 5 WHEREAS, Plaintiffs filed their complaint (ECF 1) on January 25, 2021; WHEREAS, Google filed a motion to dismiss the complaint (ECF 14) on April 22, 2021; 6 7 WHEREAS, in lieu of filing an opposition to Google's motion to dismiss, Plaintiffs filed 8 their first amended complaint (the "FAC") on June 8, 2021 (ECF 17) and a corrected FAC on June 11, 2021 (ECF 19); 9 10 WHEREAS, pursuant to the stipulation of the parties (ECF 18) granted by this Court (ECF 11 21), Google's deadline to respond to the FAC was July 13, 2021; 12 WHEREAS, Google filed a motion to dismiss the FAC (ECF 23) on July 13, 2021; 13 WHEREAS, pursuant to the stipulation of the parties (ECF 24) granted by this Court (ECF 14 25), the briefing schedule for Google's motion to dismiss set a deadline for Plaintiffs' opposition 15 on September 13, 2021 and Google's deadline for submitting a reply brief in further support of its 16 motion was due November 15, 2021 (64 days after Plaintiff's opposition); 17 WHEREAS, on August 11, 2021, in response to Plaintiffs' motion requesting an 18 emergency continuance (ECF 26), the Court stayed the case for 30 days (to September 10, 2021) 19 based on Plaintiff's counsel's health emergency; 20 WHEREAS, as required by the Court's order (ECF 27) granting the stay, Plaintiffs 21 submitted a status report (ECF 28) requesting an additional stay pending resolution of the appeals 22 in Taamneh v. Twitter, et al., No. 18-17192, Gonzalez v. Twitter, et al., No. 18-16700, and 23 Clayborn v. Twitter, et al., No. 19-15043, and Google filed a response to Plaintiffs' status report (ECF 29) objecting to the grant of an open-ended stay in this matter; 24 25 WHEREAS, on September 14, 2021, the Court issued an order (ECF 30) extending the 26 stay in this case through October 14, 2021; 27 WHEREAS, when the stay expired, the Court issued an order (ECF 31) requesting that 28 Plaintiffs submit a status report and propose a briefing schedule for Google's motion to dismiss; JOINT STIPULATION AND [PROPOSED] ORDER -1-CASE No.: 5:21-CV-00570-BLF

1	WHEREAS, Plaintiffs submitted a status report (ECF 32) stating that they "intend to file		
2	their Opposition to Defendants' motion to Dismiss Plaintiffs' First Amended Complaint before		
3	November 5, 2021[;]"		
4	WHEREAS, the Court issued an order (ECF 33) setting a briefing schedule for Google's		
5	motion to dismiss whereby Plaintiffs' opposition to the motion to dismiss is due November 5,		
6	2021, and Google's reply to Plaintiffs' opposition is due November 12, 2021;		
7	WHEREAS, Plaintiffs' counsel and Google's counsel have agreed to an extension of		
8	Google's deadline to file its reply to November 19, 2021;		
9	WHEREAS, the parties submit that this one-week extension is appropriate in light of the		
0	amount of time Plaintiffs have had to prepare the opposition to the motion to dismiss (nearly four		
1	months); the modest extension will permit Google sufficient time to reply to Plaintiffs' opposition		
12	and because such extension will not delay the hearing of December 16, 2021 on the motion to		
13	dismiss the FAC;		
4	THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval, to		
15	the following:		
16	1. Google's deadline to submit its reply in further support of its motion to dismiss the FAC		
17	shall be extended from November 12, 2021 to November 19, 2021.		
18			
9	Respectfully submitted		
20	Dated: November 2, 2021 WILSON SONSINI GOODRICH & ROSATI		
21	Professional Corporation		
22	By: <u>/s/ Meng Jia Yang</u> Meng Jia Yang		
23	mjyang@wsgr.com		
24	Attorneys for Defendant		
25	GOOGLE LLC		
26			
27			
28	-2- Case No.: 5:21-cv-00570-BLF		
	JOINT STIDLIL ATION AND [PRODOSED] ORDER		

1	Dated: November 2, 2021 THE	LAW OFFICE OF KEITH ALTMAN
2	By: _	/s/ Keith Altman
3	3	Keith Altman kaltman@lawampmmt.com
4	4 Attor	neys for Plaintiffs
5	5 AME	BASSADOR MARC GINSBERG and LITION FOR A SAFER WEB
6		EITION TORA SAI ER WEB
7	SIGNATURE A	TTFSTATION
8	SIGNATURE A	ITESTATION
9	I, Meng Jia Yang, hereby attest that all oth	er signatories listed, and on whose behalf the
10	filing is submitted, concur in the filing's content a	nd have authorized the filing of this e-filed
11	document.	
12	By:	/s/ Meng Jia Yang
13	3	Meng Jia Yang
14	1	
15	PURSUANT TO STIPULATION, IT IS SO ORD	ERED
16	5	
17	7 Dated:	Honorable Beth Labson Freeman
18	3	United States District Court Judge
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28	3	3- CASE No.: 5:21-CV-00570-BLF
	JOINT STIPULATION AND [PROPOSED] ORDER	